



M O S K O W I T Z & B O O K , L L P

Avraham C. Moskowitz
AMoskowitz@mb-llp.com

345 Seventh Avenue, 21st Floor
New York, NY 10001
Phone: (212) 221-7999
Fax: (212) 398-8835

March 3, 2021

By ECF and Email

Hon. P. Kevin Castel
U.S. District Judge
U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: United States v. Geovanny Fuentes Ramirez
S6 15 Cr. 379 (PKC)

Dear Judge Castel:

This letter is respectfully submitted on behalf of the defendant, Geovanny Fuentes Ramirez, to request a brief adjournment of the trial and the authorization of additional funding for certified Spanish interpreters to translate voluminous Spanish language discovery recently produced by the Government.

At 10:24 p.m. on March 2, 2021, the Government produced to the defense more than fifty new jail calls in Spanish, without summary translations or transcriptions and without even identifying whose calls they were, although a random sampling of the calls indicates that at least some of the calls were made by the defendant. The government also produced three hundred and thirteen pages of emails sent or received by the defendant in the Spanish language, again without translation. Simply put, there is no way that defense counsel can arrange to have the new materials translated and reviewed before the start of the trial, now scheduled for Monday March 3 and accordingly, the defense requests that the Court adjourn the trial for a week to enable counsel to have the tapes and emails translated and reviewed. If the Court insists on moving ahead with the trial as currently scheduled, it is respectfully requested that the Court preclude the Government from introducing any of the newly produced phone calls and emails into evidence. Moreover, if the telephone calls produced relate to one or more of the Government's cooperating witnesses, the Government should be precluded from calling such witnesses at the trial until such time as the defense has been able to obtain and review translations of the conversations.

Finally, it is respectfully requested that the Court authorize defense counsel to retain the services of one or more certified Spanish interpreters to listen to, transcribe and translate the newly produced phone calls and translate the emails. I have spoken to Elizabeth Caruso, a certified Spanish interpreter regularly used by both the Government and the defense in cases in this district, and she informed me that given the short timeframe to do the work before trial, the cost would be \$105 per hour, which is apparently the rush fee approved under the CJA Act. Ms.

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Caruso also advised that given the volume of the work, she would not be able to complete it all by herself before trial and thus would need the assistance of at least one, if not more interpreters.

Thank you in advance for your consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "A. Moskowitz", with a stylized flourish at the end.

Avraham C. Moskowitz

cc: All counsel of Record (by email)